6.0 STANDARD OPERATING PROCEDURES (SOPs) FOR INSTALLATION DECISION-MAKING

The AAP defines this set of Standard Operating Procedures (SOP) as those that "define the progressive steps which an installation shall take in its internal decision making process in order to manage its undertakings and their potential to affect historic properties." The Integrated Cultural Resources Management Plans (ICRMPs) developed for Fort Richardson and Fort Wainwright present a process for considering cultural resources that is suitable for the Section 106 process, but that does not address the level of specificity and process needed for operation under the AAP. This section presents SOPs for installation decision making that define a step-by-step process for treating cultural resources that should be generally applicable to USAG-AK. During the review and consultation process, these SOPs may need to be tailored specifically to each installation's process.

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

The following nine SOPs define the steps in USAG-AK's decision-making process:

SOP 1.   Identifying undertakings.
SOP 2.   Determining applicability of categorical exclusions and/or exemptions.
SOP 3   Defining Areas of Potential Effect (APE).
SOP 4   Insuring that cultural resources within an APE are located and evaluated for National Register of Historic Places (NRHP) eligibility.
SOP 5   Assessing the effects of undertakings on identified cultural resources.
SOP 6   Applying best management practices that avoid adverse effects and meet USAG-AK's preservation goals.
SOP 7   Reviewing alternatives for undertakings that have an adverse effect on cultural resources and where best management practices cannot be applied.
SOP 8   Treating or mitigating adverse effects when alternatives review fails to provide a "no impact" alternative.
SOP 9   Documenting acceptable loss when treatment is not in the public interest or financially or otherwise feasible.

In order to complete the decision making process for a project, USAG-AK will follow these nine SOPs in order (see Figure 6), proceeding to the next only when *CRM determines it is* necessary and when the former step has been adequately completed.

Additional SOPs that will prescribe the management of cultural resources include those following the initial nine decision-making SOPs:

SOP 10.　　　　Reviewing and Monitoring
SOP 11.　　　　Obtaining Technical Assistance
SOP 12.　　　　Inadvertent Discoveries and Emergencies
SOP 13.　　　　National Historic Landmarks
SOP 14.　　　　Shared Public Data
SOP 15.　　　　Curation of Artifacts
SOP 16.　　　　Capacity Building for Native Alaskan Tribes
SOP 17.　　　　Process for Tribal Consultation

Proponent identifies undertaking[1] → Submitted to DPW → Submitted to Environmental NEPA → Submitted to CRM

Is it an undertaking? (SOP 1) — NO / YES

Is the undertaking a Categorical Exclusion? (SOP 2) — YES / NO

Define APE (SOP 3)

ID and Evaluate (SOP 4) — No HP / HP

CRM comment back to NEPA

Will undertaking affect HP? (SOP 5) — NO HP Effected / YES

No HP Adversely Effected

HP Adversely Effected

See Figure 7

NEPA process continues via AR 200-2

Adverse Effects Avoided

Applying Best Management Practices (SOP 6)

Adverse Effects reduced or unchanged

REC

EA/EIS

Adverse Effects reduced or unchanged

Alternative Review (SOP 7)

Conduct Mitigation

Mitigation of Adverse Effects (SOP 8)

Alternatives/ Mitigation not feasible

Document decision of acceptable loss (SOP 9)

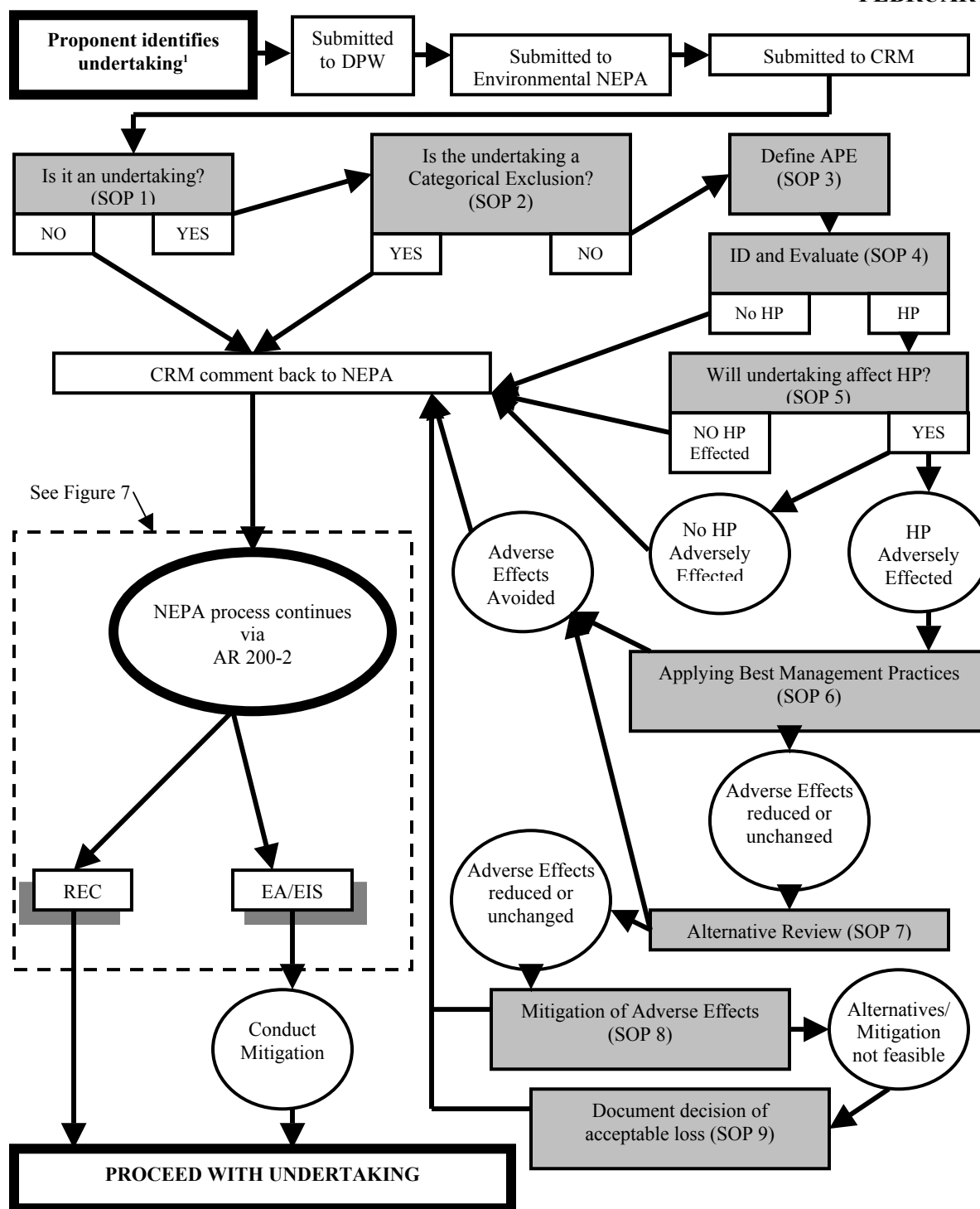**PROCEED WITH UNDERTAKING**

Figure 6. SOP Flow Chart

1.   Projects may be through work orders, 1391s, troop projects, congressional input, etc.

2.   HP = historic property

STANDARD OPERATING PROCEDURE 1:   IDENTIFYING UNDERTAKINGS

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

An "undertaking" is defined under the <u>AAP</u> as "a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of the Army, including those carried out by or on behalf of the *Army*, those carried out in *whole* or in part with Army funds, and those requiring Army approval." The CRM shall evaluate projects to determine if they meet this definition.

USAG-AK undertakings may take the form of projects, work orders, contractor actions, permits, leases, and other activity as defined above. Undertakings may originate with DPW, infrastructure maintenance contractors, MILCON project proponents, and other entities. If another Defense Department command or Federal agency is involved with USAG-AK in an undertaking, USAG-AK and the other agency may mutually agree that the other agency may be designated as the lead Federal agency. In such cases, undertakings will be reviewed in accordance with *36 CFR § 800*.

Tenant organizations must coordinate with USAG-AK to obtain up-to-date cultural resource information. Undertakings conducted by or for Army tenants with funding appropriated for the tenant organization are the responsibility of the tenant; likewise, compliance with 36 CFR § 800 to these undertakings is the responsibility of the tenant.

SOP 1.1   Notification of Potential Undertakings

The CRM shall be notified of potential undertakings early in the planning process, whether or not they appear to impact historic properties. Proponents should provide the following information to the CRM to begin this review:

- Description of the project or activity

- Potential site locations

- Schedule information or suspense dates

- Point of Contact

[This section to be developed further with specific suggestions for how to coordinate with 1391 projects, work orders, contractor-initiated repair and maintenance, etc.]

SOP 1.2   Determining an Undertaking

The installation's CRM will then determine whether the project or activity qualifies as an undertaking, and if so, whether it has the potential to affect cultural resources.

1. If the project does not qualify as an undertaking, the CRM will document this determination in the project files, which shall be retained for future program review, or

2. If the project qualifies as an undertaking, continue to SOP 2.

STANDARD OPERATING PROCEDURE 2:   *EXEMPT UNDERTAKINGS*

> **Note: The Standard Operating Procedures (SOPs) presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

After a project, activity, or program has been determined to be an undertaking, the Cultural Resources Manager (CRM) shall determine if the undertaking is one of the following categorical exclusions *or exempted undertakings.* However, only the CRM can determine if a proposed undertaking falls *into one of these categories*. All proposed undertakings will continue to be coordinated with the CRM, and undertakings determined to fall under categorical exclusions will be accounted for in the annual report (see section *4.0 Exempt Undertakings*).

SOP 2.1   Army-wide Exempted Undertakings

There are Army-wide exemptions for undertakings where there is an imminent threat to human health and safety as presented in the AAP (see section 4.1 Army-Wide *Exempt Undertakings*):

- In-place disposal of unexploded ordnance; or

- Disposal of ordnance in existing open burning/open detonation units; or

- Emergency response to releases of hazardous substances, pollutants and contaminants; or

- Military activities in existing designated surface danger zones (SDZs); SDZs are temporary in nature and only active during training activities. The exemption will apply to designated impact/dud areas, areas with unexploded ordnance. SDZs *are exempted* only when active.

Undertakings addressed through a fully executed nationwide Programmatic Agreement or other Program Alternative executed in accordance with 36 CFR § 800.14 of Section 106 regulations, a Program comment, or a Memorandum of Agreement will be exempt.

SOP 2.2   Areas of USAG-AK that are Exempt from Archaeological and Properties of Traditional Religious and Cultural Significance Inventory

Some areas of USAG-AK will be exempted from archaeological and properties of traditional religious and cultural significance inventory requirements during the planning period, low site potential, or limited potential for mission impact.

- *Impact Areas*: Designated impact areas contain unexploded, anti-personnel ordnance and are off-limits to cultural resources management. *Such areas may contain cultural resources significant to Tribes*. These sites should be recorded for general documentation. There is no access into the areas.

- *Cantonment / Developed Areas*:   The cantonment area is the central, developed portion of an installation.   Fort Richardson's cantonment contains 568 buildings, covers 5,760 acres and includes most areas not part of training or impact areas (Center for Ecological Management of Military Lands, 1998a).   On Fort Richardson, the high level of disturbance from development means that most of the cantonment has negligible potential to contain archaeological sites that have integrity.   However, isolated portions of the cantonment, notably near Ship Creek and northeast of Camp Carroll, remain relatively undisturbed and are suitable for survey.   At Fort Wainwright, the areas of the cantonment may contain archaeological remains related to earlier homesteads and is not excluded from survey.   Coordination with the CRM will be needed to determine if cultural resource surveys are appropriate for proposed undertaking in cantonment areas.   *If archaeological material is uncovered during construction activities, SOP 12.3 Emergency Actions will be followed.*

SOP 2.3   Contaminated Areas

Contaminated areas may be identified on USAG-AK managed lands. Hazmat, restoration and clean-up project teams will need to coordinate with the CRM, in order to determine the need and efficacy of survey for proposed undertakings in contaminated areas. Some contaminated areas may be off limits to ground disturbing activities, including archaeological surveys. Contaminated areas do not pose an imminent threat and are not exempt from this HPC. This will be coordinated with the CRM.

SOP 2.4   Land Management Undertakings under the Integrated Natural Resources Management Plans

The Integrated Natural Resources Management Plan for Forts Richardson and Wainwright identifies land

management activities that will have no effect on cultural resources:

- Maintenance work on existing features, such as roads, fire lanes, mowed areas, active disposal areas and manmade ditches, waterways, and ponds, when no new ground disturbance is proposed.

- *Outdoor recreation* programs including hunting, fishing, and non-consumptive uses in accordance with Army regulations *will have limited exemptions, see SOP 1.4.2.1.*

- The following natural resources management activities: tree plantings *in cantonments*, planting and maintenance of wildlife food and shrub plots in previously disturbed areas, *and* prescribed burning of *active* rangeland~~,~~

- Removal and replacement, in kind, of plant materials when thy pose an imminent hazard to people or structures.

SOP 2.5   Maintenance and Repair of Open Spaces

Routine maintenance and repair activities associated with open areas on the installations are unlikely to

adversely affect cultural resources; therefore these types of activities have been documented as

categorical exclusions:

- Maintenance of existing grounds and landscaping. This includes pruning of shrubbery and trees.

- Minimal grading to direct water away from the bases of buildings.

- Paving and repair of streets and driveways with materials and finishes that match existing materials and finishes.

- Replacement and repair of sidewalks and curbing in existing locations with materials that match existing materials and finishes, installation techniques, profiles, color, dimensions, and texture.

- Repair and replacement of existing water, sewage, and heating lines in their present configuration and alignment without altering or damaging existing site features such as vegetation, lighting, sidewalks, steps, and building foundations.

- Repair and replacement of existing electric lines and poles in their present configuration, height and type.

SOP 2.6 Maintenance and Repair of Roofs

Routine maintenance and repair activities for the roofs of historic structures are unlikely to adversely affect historic properties; therefore these types of activities have been documented as categorical exclusions:

- Removing of ice build-up by methods that will not damage roofing or walls.

- Routine cleaning of gutters and downspouts.

- Installing new insulation in roof cavity or attic floor.

- Routine in-kind maintenance of flashing.

- Routine in-kind maintenance of roofing.

- Repair of roofs using in-kind material. Do not use tar roof patches on metal roofing.

- Painting of metal roofs to retain existing color, with a color identified in design standards, or to restore the historic color scheme.

- Replacing existing roofing in-kind or to match historic roofing material. Installing ice-and-water barrier material along the lower edges while replacing or repairing roofing.

- Placement of snow guards that are in keeping with the roof's design to prevent hazards from accumulated snow or ice.

SOP 2.7 Maintenance and Repair of Exterior Walls

Routine maintenance and repair activities for exterior walls are unlikely to adversely affect historic properties; therefore these types of activities have been documented as categorical exclusions:

- Cleaning wall surfaces with standard garden hose water pressure and natural bristle brushes.

- Repair of existing foundation walls, footings, piers, and slabs to match existing materials, installation technique, profile, and finishes.

- Exterior painting provided that preparation techniques that follow the Secretary of the Interior's Standards are employed to ensure that the new paint surface is compatible with the foundation, and that the original texture and color are matched.

- Replacement in-kind of existing siding.

- Match existing size, color, and texture of masonry when making repairs.

SOP 2.8   Maintenance and Repair of Exterior Windows

Windows are major elements in defining the architectural character of buildings. It is desirable to maintain historic windows and if necessary, replace in-kind. The following repair and maintenance activities are unlikely to adversely affect the historic properties; therefore, these types of activities have been documented as categorical exclusions:

- General maintenance to insure proper operation.

- Cleaning with standard garden hose pressure and appropriate detergents.

- Reglazing and caulking broken windowpanes in-kind.

- Replacing and refinishing in-kind window trim.

- Repair of existing window and door screen in-kind.

- Replacement of window sash with energy efficient sashes that match in material, style, size, and finish.

SOP 2.9   Maintenance and Repair of Exterior Doors, Porches, and Entrances

The following routine maintenance and repair activities are unlikely to adversely affect the historic properties; therefore, these types of activities have been documented as categorical exclusions:

- General maintenance to ensure continued life of historic doors, porches, and entrances.

- Repair of existing doors, porches, and entrances sympathetic to their architectural character.

- Replacement of doors, porches, and entrances in-kind when repair is not feasible.

Following the determination as to whether an undertaking is an exemption or categorical exclusion, the CRM shall either:

1. If an undertaking qualifies as an exemption or categorical exclusion, the project file will indicate this qualification and no further action is required.

2. If an undertaking does not qualify as an exemption or categorical exclusion, continue with SOP 3.

STANDARD OPERATING PROCEDURE 3:   Define the Area of Potential Effect (APE)

> **Note: The Standard Operating Procedures (SOP) presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

The Area of Potential Effect (APE) is defined at Section 1.5 of the AAP as "the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such historic properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."

The size of the APE is determined on a case-by-case basis *by the CRM* and includes in its calculation the scale and nature of the undertaking. Generally, the size of the APE will be commensurate with the size of the project, encompassing both potential direct and indirect effects. The APE for interior work on buildings that does not have the potential to affect exteriors will be only that building. Cumulative effects may also influence the final APE. Projects should also take visual impacts into account when determining the APE.

To determine the project APE:

- Categorize the undertaking (repair and maintenance, ground disturbing activity, etc.);

- Determine whether the effects typically associated with this category of undertaking are the expected effects for the project;

- Based on anticipated effect(s), determine *where* those effects might occur in relation to the project. The areas where effects might occur constitute the APE;

- Examine the APE to determine whether the proposed undertaking is likely to affect cultural resources;

- Complete this process for all potential project locations;

- Include all APE definitions on a project map, including areas of direct and indirect effect;

- Determine whether the scope and/or nature of the undertaking might result in additional or other effects.

Upon determination of the APE, the Cultural Resources Manager shall proceed to SOP 4.

STANDARD OPERATING PROCEDURE 4:   IDENTIFYING   AND   EVALUATING CULTURAL RESOURCES

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

The purpose of identification is to collect information about cultural resources within an APE. After the resources in the APE are identified, they are evaluated for National Register of Historic Places (NRHP.) Not all resources will necessarily qualify for inclusion in the NRHP. NRHP eligibility is a threshold that affects subsequent management actions for the resources. Properties do not have to be formally listed in the NRHP to meet this threshold.[1]

SOP 4.1   Identification

Identification studies typically include background research, field investigations, consultation, analysis, and documentation of findings. Prior to a project specific identification study, the CRM will conduct a pre-inventory analysis to determine whether additional investigation is necessary, and, if so, what type of inventory approach is appropriate.

SOP 4.1.1   Preliminary Analysis

The CRM will review the project area to establish whether the APE has been previously inventoried and to determine what types of cultural resources are likely to be found in the APE. Resources for this review include, *but not limited to*:

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[1] Formal listing of properties in the NRHP is coordinated with the *Army* Historic Preservation Officer. Army Regulation 200-4, section 3-2, recognizes that eligible properties are managed the same way whether or not they are formally listed in the NRHP and states that formal listing efforts are not a program priority.

- The inventory and maps of USAG-AK cultural resources held on the GIS at Fort Richardson, including planning level surveys, building inventories, *AHRS data*, maps of established historic districts and the Ladd Field National Historic Landmark, and maps of archaeological sites;

- Archaeological predictive models

- Any known properties of traditional religious and cultural significance

Based on this review, the CRM will assess the project as follows:

- If the area has been investigated previously, assess the quality of any collected data. If the area has not been investigated, or if it has been investigated, but data quality is poor or outdated, further identification efforts will be required.

- Determine the need for additional identification based on Planning Level Survey data, and/or predictive model results, and preliminary tribal consultation on potential properties of traditional religious and cultural significance The CRM will determine whether the collective data provides a basis for decision-making without addition identification activities:

  o Documentation of a decision not to proceed with further identification activities shall be included in the project file; and
  o The decision shall be documented in the annual report to the consulting parties; documentation shall include the basis for the decision.

If additional identification studies are required, the appropriate tasks may include background research, field investigation, tribal consultation, analysis, and report preparation. The persons conducting identification studies and other cultural resources activities shall meet professional qualifications as described in section 5.3.

SOP 4.1.2   Survey

- In general, there are two types of surveys: the reconnaissance survey and the intensive survey. The reconnaissance survey is a light inspection aimed at developing a general overview of an area's resources. The primary reason for a reconnaissance survey is to support background research in preparation for an intensive survey. The objective of an intensive survey is to identify completely and precisely all properties in a specified area based on a specific research design. It involves background research and a thorough inspection and documentation of all cultural resources in an area. It should provide an inventory and necessary information to evaluate properties for the NRHP. Methods for conducting historic and archaeological surveys differ. Standards and guidelines for each may be found in "The Secretary of the Interior's Standards for Identification*"* and in "Guidelines for Local Surveys: A Basis for Preservation Planning."

Background research should be conducted in preparation for survey as appropriate to the project. Potential sources include installation files and maps; previous identification surveys; Bureau of Land Management files; Alaska Heritage Resource Survey (AHRS) maps and files at the Alaska Office of History and Archeology; previously identified historic contexts for the region; and local histories. Information may also be available from local governments, Alaska Native organizations and Tribal governments, universities, and public and private groups and institutions.

As part of the research process, USAG-AK should periodically contact the NPS or U.S. Army Environmental Center (AEC) to determine whether any nationwide historic contexts have been developed that might apply to cultural resources on USAG-AK installations. Similarly, the SHPO may have a statewide context against which the historic relevance of a resource can be weighed. USAG-AK has been proactive in developing historic contexts for resources on its installation that are specific to the history of the military in Alaska and to regional historical activities. This effort to address gaps in the literature for current and future reference should continue.

The SHPO requests that AHRS site forms be completed and turned in for each archaeological site identified and for each significant historic building. The AHRS is a database of all known historic and archaeological sites in Alaska, regardless of NRHP eligibility.

SOP 4.1.2.1   Requirements for Archaeological Survey

A cultural resources professional with minimum qualifications as defined in 36 CFR § 61, i.e., a Master's degree in archaeology or anthropology and at least two years of relevant experience, will supervise all archaeological surveys. The installation Cultural Resources Manager will provide general survey areas to the field archaeologist who will:

- **Determine final survey area**: Only areas with potential to contain significant archaeological sites in the project's APE will be surveyed. Areas that are already highly disturbed (*e.g.* improved areas, borrow pits, etc.) and areas inaccessible to military training or other USAG-AK undertakings (*e.g.* wetlands, steep slopes, etc.) will be excluded. Areas that have been previously surveyed will also be excluded if existing data is determined *by the CRM* to be sufficient for the proposed project.

- **Survey**: The archaeologist will be responsible for conducting surveys according to the Secretary of the Interior's Professional Qualifications Standards (36 CFR § 61) and the yearly USAG-AK research design. The archaeologist will complete *Alaska Heritage Resources Survey* (AHRS) entries for all identified sites. Whenever possible, the archaeologist will abide by a policy of no collection during survey, unless the archaeologist determines that extraordinary circumstances exist. Artifacts collected under those circumstances will be submitted to USAG-AK for curation in *federally certified museum*. Submitted artifacts will be classified according to site and clearly labeled *in accordance with repository's guidelines*.

- *Submit report*: A report (3 copies) will be submitted to USAG-AK including, but not limited to:

  - a description of survey methods,
  - a short description of sites identified including a determination of the need for further evaluation (in the case of sites potentially eligible for the National Register *of Historic Places*) or lack thereof (in the case of sites ineligible for the National Register *of Historic Places*),
  - copies of completed AHRS forms,
  - a map of the survey area(s), and
  - a map of inventoried archaeological sites.
  - *GIS data layers*: Maps will be digitized and submitted to USAG-AK in a format compatible with ArcInfo/ArcView.

SOP 4.1.2.2   Requirements for Surveys of Historic Buildings and Structures

A cultural resources professional with minimum qualifications as defined in 36 CFR § 61 for historian, architectural historian, or historic architect will supervise building and structure surveys. Survey requirements will vary depending on the scope and character of the undertaking. In many cases existing inventories will be sufficient to identify historic buildings and structures in the APE as described in SOP 4.1.1. Building and structure surveys may be conducted as needed as part of ongoing planning level survey work as well as to provide information on resources in an APE that are not sufficiently documents.

- **Determine appropriate survey requirements**: The CRM will determine whether in-house or external survey would be appropriate to the scope and time frame of the undertaking, and whether historic context material will need to be developed concurrently for the evaluation phase.

- **Survey**: Surveys should combine site inspections with background research. Background research may include literature reviews, archival research, interviews and consultation as appropriate. Documentary research should be thorough enough to provide for the evaluation of any resources identified. The use of interviews and oral histories is encouraged to provide additional information. Site inspections should include a minimum of a sketch site plan and digital photographs of setting and exterior elevation(s) for each resource identified.

- **Submit report**: A report will be submitted to the CRM including, but not limited to: description and map of survey area(s), documented historical narrative, architectural description using Historic American Buildings Survey (HABS) level 4, *or equivalent Historic American Engineer Record (HAER*) if recording a structure, standards as guidance, photos of all resources identified, and list of sources consulted. It should also include the evaluation of significance discussed in SOP 4.2 below. Maps will be digitized and submitted in a format compatible with ArcInfo/ArcView. In cases of militarily sensitive properties, photos and maps may be subject to internal review and restriction.

If no historic resources are identified within the APE of a proposed project, the CRM will document the absence of resources and the means used to determine this absence in the project file and the project can proceed without further consideration of historic resources.

If historic resources are identified in the APE, the CRM will determine if it is eligible for listing in the National Register of Historic Places. See SOP 4.2.

SOP 4.1.2.3   Specific Requirements for Inventories of Properties of Traditional Religious and Cultural Significance

USAG-AK will consider Properties of Traditional Religious and Cultural Significance in project planning. In respect of confidentiality issues, USAG-AK will only collect that information necessary to consider adverse affects in the planning process; this may or may not involve determining a site's eligibility for inclusion in the NRHP. Tribal consultation shall determine the level of identification effort that is merited. It should be noted that Properties of Traditional Religious and Cultural Significances

may include natural settings and do not necessarily need to contain culturally modified objects/sites to be considered in the planning process.

USAG-AK will develop a GIS-based database for recording Properties of Traditional Religious and Cultural Significance. This will be accomplished in a manner sensitive to Tribal sovereignty, religious freedom, and confidentiality concerns. If necessary, database access may be restricted to specific staff. When USAG-AK undertakings are proposed, the CRM will check the project location against sites identified in the database. Consultation will be initiated when a project has the potential of affecting identified sites. For areas that have not been surveyed for Properties of Traditional Religious and Cultural Significance – consultation will be initiated.

Confidentiality

Tribes may determine that sharing information about a Property of Traditional Religious and Cultural Significance is inappropriate. In such circumstances consideration of adverse affects in the planning process is still possible. Tribes may delineate a boundary around a significant site, which will be large enough to avoid inadvertent discovery of the property. The boundary demarcation will be represented in the GIS database. When Army undertakings within the boundary are proposed, consultation with appropriate Tribes will be initiated to discover whether the proposed project will affect the Property of Traditional Religious and Cultural Significance. If the project will adversely affect the site, avoidance through project location modification will be explored. Where adverse affects cannot be avoided, consultation with Tribes shall determine appropriate mitigation measures.

SOP 4.2 Evaluation

Evaluation for eligibility is a judgment process based on established criteria and guidance developed by the National Register *of Historic Places*. The process relies on two key concepts: significance and

integrity. Both of these thresholds must be met to establish NRHP eligibility. Understanding the historic context of a property allows reasonable judgments to be made about those thresholds. Because significance and integrity are subjective concepts, the NRHP has developed criteria for evaluation and definitions of integrity that this SOP must follow. These are provided in 36 CFR § 60.4 and summarized in Appendix *2*. While the same NRHP framework is used to evaluate historic resources, archaeological resources, and *Properties of Traditional Religious and Cultural Significance*, evaluations will emphasize the aspects appropriate to the type of resource under consideration.

SOP 4.2.1   Procedures for Evaluation

The procedures to be followed by the CRM for evaluating a cultural resource of any type are as follows:

SOP 4.2.1.1 Categorize the Resource

The CRM shall determine if the cultural resource is an archaeological site, property of traditional religious and cultural importance, building, structure, object, district, or combination. If the property is a property of traditional religious and cultural significance, SOP 4.2.2 should be followed.

SOP 4.2.1.2 Establish the Historic Context of the Cultural Resource

- The CRM shall identify the theme(s), geographical limits, and chronological period that provide a perspective from which to evaluate the cultural resource's significance; and

- The CRM shall determine how the theme(s) within the context may be significant to the history of the local area, the State or the nation. A theme is considered significant if scholarly research indicates that it is important in American or regional history; and

- The CRM shall determine if the cultural resource type is important in illustrating the historic context. Contexts may be represented by a single cultural resource type or by a variety of types; and

- *The CRM shall determine how the cultural resource illustrates the historic context through specific historic associations, architectural or engineering values, or information potential; and*

- *The CRM shall determine whether the cultural resource possesses the physical features necessary to convey the aspect of prehistory or history with which it is associated.*

SOP 4.2.1.3   Determine Whether the Cultural Resource is Significant under the National Register of Historic Places Criteria

The CRM shall apply the following NRHP criteria for evaluation to the cultural resource. If the cultural resource meets one or more of these criteria and retains integrity, the CRM shall proceed to SOP 4.2.1.4. If the resource does not meet any of the criteria *or does not retain integrity*, the CRM shall determine that the resource is not eligible for the NRHP; this determination will be stated in project file. In that case, no further action is required under SOP 1-9 of this HPC. Determinations of Eligibility (DOEs) are subject to review through the National Environmental Policy Act (NEPA) process and the USAG-AK Annual Report. See SOP 10.

NRHP Criteria for Evaluation:

> **"Criteria**: The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:
>
> A. that are associated with events that have made a significant contribution to the broad patterns of our history; or
>
> B. that are associated with the lives of persons significant in our past; or
>
> C. that embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
>
> D. that have yielded, or may be likely to yield, information important in prehistory or history."
>
> - Criterion A: Event. Under this criterion, a cultural resource must be associated with one or more events important in the historic context. To establish significance under this criterion:

- Determine the nature and origin of the cultural resource; and
- Identify the significant historic context with which it is associated, and
- Evaluate the historic contexts
- Evaluate the resource's history to determine whether it is associated with the historic context in any important way.

- Criterion B: Person. This criterion applies to cultural resources associated with individuals whose activities are demonstrably important within a local, State, or national context. The cultural resource must illustrate the person's achievement. To determine a cultural resource's significance under this criterion:

  - Determine the importance of the individual; and.
  - Ascertain the length and nature of the person's association with the resource and determine if there are other cultural resources associated with the individual that more appropriately represent that person's contributions

- Criterion C: Design/Construction. This criterion applies to cultural resources significant for their physical design or construction, including such elements as architecture, landscape architecture, engineering, and artwork. The historic property, to qualify, must:

  - Embody distinctive characteristics of a type, period, or method of construction; or
  - Represent the work of a master; or
  - Possess high artistic value; or
  - Represent a significant and distinguishable entity whose components may lack individual distinction.

- Criterion D: Information Potential. Cultural resources may be eligible for the NRHP if they have yielded, or may be likely to yield, information important to prehistory (pre-contact) or history (post-contact).
  SOP 4.2.1.4 Determine if the Historic Property Represents a Type Usually Excluded from the National Register of Historic Places, and if so, Meets any of the Criteria Considerations

Some kinds of properties are normally excluded from NRHP eligibility. These include religious properties, properties that have been moved, birthplaces and graves, cemeteries reconstructed properties and properties less than fifty years old. However, exceptions can be made for these kinds of properties if they meet one of the standard criteria in 4.2.1.3 above *and* fall under one of the seven special Criteria Considerations listed in Appendix 1 *2*. Before examining the Criteria Considerations, the CRM shall

determine if the historic property meets one or more of the four NRHP Criteria for Evaluation (SOP 4.2.1.3) and retains integrity.

- If the historic property meets one or more of the four Criteria for Evaluation and has integrity, determine if the historic property is of a type that is usually excluded from the NRHP. If it does not meet one of these types, proceed to SOP 4.2.1.5; or

- If the historic property is a type cited in the Criteria Considerations, the CRM must determine if the historic property meets the special requirements stipulated for that type in the Criteria Considerations. If so, the CRM shall proceed to SOP 4.2.1.5. If the historic property does not meet the requirements, the CRM shall determine that the historic property is not eligible for the NRHP and document that determination in project file. No further action is required under SOP 1-9 of this HPC.

SOP 4.2.1.5   Evaluate the Cultural Resource's Integrity

In addition to significance, a cultural resource must possess integrity to be eligible for the NRHP. Integrity is the ability of the resource to convey its significance; to reveal to the viewer the reason for its inclusion in the NRHP. Integrity is a subjective quality, but must be judged based on how the cultural resource's physical features relate to its significance. Seven aspects are used to define integrity. Some, if not all, should be present for the resource to retain its historic integrity: location, design, setting, materials, workmanship, feeling, and association. These concepts are defined in more detail in Appendix 2. The CRM shall assess integrity as follows:

- The CRM will define the essential physical features that must be present for a cultural resource to represent its significance. Although not all the historic physical features need to be present, those that convey its historic identity are necessary, including those that define why and when the resource was significant. Under Criteria A and B, the resource must retain those features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s). Under Criterion C, the resource must retain most of the physical features that constitute that style or technique. Under Criterion D, integrity depends on the data requirements defined in the research design. The significant data contained in the historic resource must remain sufficiently intact to yield the expected important information under appropriate methodologies; and

- The CRM will determine whether the essential physical features are enough to convey significance.

- The CRM will determine whether the cultural resource needs to be compared with similar properties (historic and non-historic). A comparison may help determine what physical features are essential to cultural resources of that type; and

- The CRM will determine, based on the significance and essential physical features, which aspects of integrity are particularly vital to the cultural resource being evaluated and if they are present. For Criterion A and B, the presence of all seven aspects of integrity are the ideal, however integrity of design and workmanship may not be as important or relevant. Under Criterion C, a cultural resource must have integrity of design, workmanship, and materials. Location and setting are important for those whose design is a reflection of their immediate environment. For Criterion D, *settings will be included under criterion D for evaluating sites. Riverine, lake, bluff, or ridge top settings are very important to the analysis of prehistoric and historic sites, especially as a factor in determining the pattern of sites.*

If the CRM determines that a cultural resource meets one or more of the four Criteria for Evaluation, integrity must be evaluated. If, upon evaluation, the CRM determines that the resource retains integrity, the resource shall be determined eligible for the NRHP and the CRM shall continue with SOP 5. If the CRM determines that the resource does not retain integrity, the CRM will determine that the resource is not eligible for the NRHP. This determination shall be documented in the project file and no further action is required under SOP 1-9 of this HPC.

SOP 4.2.2   Determination of Eligibility for Inclusion in the NRHP for Properties of Traditional Religious and Cultural Significance

As discussed previously, it may not be necessary or appropriate to specifically identify and evaluate all Properties of Traditional Religious and Cultural Significance for inclusion in the National Register of Historic Places. However, when this is determined to be an appropriate measure, the following guidelines will be applied: The identification, evaluation, and management of Properties of Traditional Religious and Cultural Significance require Tribal consultation and participation.

A Property of Traditional Religious and Cultural Significance is defined in National Register Bulletin 38 as a site "eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in

maintaining the continuing cultural identity of the community." Besides meeting these requirements, Properties of Traditional Religious and Cultural Significance must also meet one or more of the *four NRHP Criteria for Eligibility (See SOP 4.2.1.3) and retain integrity (See SOP 4.2.1.5). The statement of significance describing why a site is eligible will be based on traditional knowledge, literature reviews and archival records. Integrity is best determined by the Tribe recognizing the site's significance.*

STANDARD OPERATING PROCEDURE 5:   ASSESSING EFFECTS

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

This Standard Operating Procedure (SOP) provides for the consideration of the effect of a project on cultural resources. If the CRM determines that cultural resources are present within a project APE, it must be determined if the undertaking will affect those properties. Effect is defined as an alteration to the characteristics of a cultural resource that qualify it for listing in or eligibility for listing in the National Register of Historic Places. Based upon the evaluation of effect, the CRM will make one of the following determinations:

SOP 5.1   No Historic Properties Affected

If the CRM finds that there are no cultural resources present or that there are cultural resources present but the undertaking will not alter the characteristics of the resource that qualify it for eligibility for the NRHP, then the CRM will determine that there will be *no historic properties affected*.   This determination will be documented in the project file *as well as in the NEPA*. The documentation shall include

> (1) a description of the activity and its area of potential effects (including photographs, maps, drawings, as necessary);
>
> (2) a description of steps taken to identify cultural resources; and
>
> (3) the basis for determining that no historic properties are present or affected.

No further action is required under SOP 1- 9 of this HPC.

SOP 5.2 Historic Properties Affected

If the CRM finds that there are cultural resources that may be affected by the undertaking, the CRM shall determine if these effects are adverse.

SOP 5.2.1   Finding of No Adverse Effect

This determination is made when there may _be_ an effect, but the effect will not be harmful to those characteristics that qualify the property for inclusion in the National Register of Historic Places. The following documentation will be included in the project file:

1. a description of the activity and its area of potential effects (including photographs, maps drawings, as necessary);

2. a description of steps taken to identify cultural resources;

3. a description of the affected cultural resource(s) (including information on the characteristics that qualify the property for inclusion in the National Register of Historic Places);

4. a description of the effects of the activity on the property; and

5. an explanation of why the criteria of adverse effect were found inapplicable.

No further action is required under SOP 1- 9 of this HPC.

SOP 5.2.2   Finding of Adverse Effect

This determination is made when there may be an effect, and that effect could diminish the integrity of the characteristics that qualify the property for the National Register of Historic Places.

36 CFR § 800.5(1): An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a cultural resource that qualify it for inclusion in the National Register of Historic Places in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a cultural resource, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register of Historic Places. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

36 CFR § 800.5(2): Adverse effects on cultural resources include, but are not limited to:

"(*i*) Physical destruction of or damage to all or part of the property;

(*ii*) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR § 68) and applicable guidelines;

(*iii*) Removal of property from its historic location;

(*iv*) Change of the character of the property's use or physical features within the property's setting that contribute to its historic significance;

(*v*) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;

(*vi*) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and

(*vii*) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance."

When the CRM makes a finding of adverse effect, the procedures set forth in SOPS 6 – 9 shall be followed.

STANDARD OPERATING PROCEDURE 6: APPLYING BEST MANAGEMENT PRACTICES

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

This Standard Operating Procedure (SOP) provides for the consideration and application of historic preservation management with emphasis on avoiding adverse effects and meeting identified HPC preservation goals. When the CRM determines that a project will adversely effect cultural resources in accordance with SOP 5 above, the best management practices in this SOP should be applied, to the extent feasible, to avoid or reduce those effects. This may require consideration of alternatives, when feasible. In addition, all best management practices will be documented in the project file for specific projects.

SOP 6.1 Archaeological Sites

- *See SOP 7.1(planning, avoidance, protection, and monitoring)*

- when possible, undertakings will be planned utilizing several potential locations so that conflicts with significant sites can be avoided without project delay; and/or

- when proposed undertakings are determined to have a potential effect on sites, USAG-AK will, to the extent feasible, avoid the adverse effect by modifying the project design or project location so that the site is not impacted; and/or

- sites located in areas where physical damage from erosion, vandalism, or exposure to the environment is likely will receive protective measures and periodic monitoring.

SOP 6.2 Properties of Tradition Religious and Cultural Importance

- *See SOP 7.1(planning, avoidance, protection, and monitoring)*

- when possible, projects will be planned utilizing several potential locations so that conflicts with properties of traditional religious and cultural importance can be avoided without project delay; and/or

- when proposed undertakings are determined to have a potential effect on properties of traditional religious and cultural importance, USAG-AK will, to the extent feasible,

avoid the adverse effect by modifying the project design or project location so that the property is not impacted; and/or

- properties located in areas where physical damage from erosion, vandalism, or exposure to the environment is likely will receive protective measures and periodic monitoring.

SOP 6.3   Historic Buildings, Structures, and Objects

- all preservation, rehabilitation, and restoration will, to the extent feasible, follow the Secretary of the Interior's Standards for the Treatment of Historic Properties;

- as a matter of policy and subject to availability of funds, USAG-AK will attempt to adapt historic buildings and structures for reuse rather than demolishing or mothballing;

- the CRM or the designee will inspect historic buildings for maintenance problems and signs of deterioration.

SOP 6.4   Historic Districts

As of 2003, Fort Richardson has identified two historic districts, the NRHP listed Nike Site Summit Historic District and the Fort Richardson Historic District in the cantonment determined eligible for listing in the NRHP.   Fort Wainwright has identified four archaeological districts, Blair Lakes, Clear Creek Buttes, Wood River Buttes and Donnelly Ridge Archaeological District eligible for listing in the NRHP.   Fort Wainwright Main Post contains the Ladd Field National Historic Landmark and the Ladd Air Force Base Historic District. Ladd Field NHL was designated in 1984. Ladd Air Force Base Historic District was determined eligible for listing in the NRHP in 2002. These represent the status of eligible districts at the time of the preparation of this HPC. It *is* subject to change over time. The CRM should be consulted for updates.

Best Management Practices for the archaeological districts include:

- *See SOP 7.1(planning, avoidance, protection, and monitoring)*

- when possible, projects will be planned to avoid the archaeological districts; and/or

- when proposed undertakings are determined to have a potential effect on archaeological districts, USAG-AK will, to the extent feasible, avoid the adverse effect by modifying the project design or project location so that the district is not impacted; and/or

- sites located in areas where physical damage from erosion, vandalism, or exposure to the environment is likely will receive protective measures and periodic monitoring.

Best Management Practices for built resource districts include:

- all preservation, rehabilitation, and restoration will, to the extent feasible, follow the Secretary of the Interior's Standards for the Treatment of Historic Properties;

- as a matter of policy and subject to availability of funds, USAG-AK will attempt to adapt historic buildings and structures for reuse rather than demolishing or mothballing;

- the CRM or the designee will inspect historic buildings for maintenance problems and signs of deterioration.

STANDARD OPERATING PROCEDURE 7: ALTERNATIVES REVIEW

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

While USAG-AK will attempt to avoid or minimize adverse effects through best management practices, there are times when best management practices are not feasible or an undertaking cannot avoid *adversely* affecting a cultural resource. In this case, a thorough review of alternatives will take place prior to the application of any measures to mitigate adverse effects. *This SOP addresses the first step to lead to mitigation-consideration of what undertaking alternatives may exist to avoid affecting a historic resource. SOP 8 addresses mitigation.*

If it is determined that an activity will have an adverse effect on historic properties, USAG-AK will conduct a further review of project alternatives in an effort to find a feasible alternative that would avoid the impacts. When the cultural resource is an historic building or structure, and the project involves demolition, the evaluation of alternatives for the historic property will include the calculation of the cost of alternatives. The Cultural Resources Manager will document these in the project file.

SOP 7.1 Archaeological Sites and Properties of Traditional Religious and Cultural Significance

For projects that may affect archaeological sites and properties of traditional religious and cultural significance, USAG-AK will consider the following alternatives:

- *Planning: A planning meeting will be coordinated with designated tribal members to discuss projects that impact archaeological sites and properties of traditional religious and cultural significance. The meeting will focus on how sites will be avoided, protected, and/or monitored.*

- **Avoidance**: In many instances, projects proposed for areas containing archaeological sites and/or properties of traditional religious and cultural significance are eligible or potentially eligible for the National Register of Historic Places can be changed to avoid impacts. Avoidance is most easily arranged during planning stages when an area is being chosen for a project. Siting of projects in areas not containing significant resources can often be achieved with little adjustment or delay in the planning process. Even large-scale projects, such as building and road construction, can often be planned to avoid archaeologically and culturally sensitive areas.

- **Protection**: Sometimes undertakings cannot be planned to avoid areas containing archaeological sites and properties of traditional religious and cultural significance. In these instances, it is often possible to protect sites from adverse impacts by physically placing them off-limits. *Barriers, markers, signs, and fencing used to protect sites from adverse effects will include an educational panel and legal implications for disturbing the site.* Physical obstructions, combined with verbal instruction and/or special contractual obligations, are usually sufficient to protect sites from activities and inadvertent damage. The marking-off of areas, however, has the disadvantage of potentially alerting the public to the presence of significant resources.

  In cases involving large archaeological sites, it may be possible to protect only a portion of the site. The area chosen for protection must either be a "valid sample" representative of the site or if possible, a definable area upon which the site's significance rests. Given these conditions, a portion of the site may be placed "off-limits."

  When protection in the form of an "off-limits" designation for a site is not possible, another form of physical protection may be implemented in special instances. A layer of sterile soil not containing archaeological or cultural remains can be placed on top of the site as a buffer between the site and the activity. Although access to the site would be hindered, its contents are sealed for examination at a later date.

  Protection options should to be discussed and coordinated with federally recognized tribes that have an interest in the area. Plans may be arranged ahead of time for known situations and conditions and even for specific sites.

  Monitoring: Physical protection of an archaeological site or property of traditional religious and cultural significance requires periodic monitoring to assess the effectiveness of implementation. Any measure being implemented to protect such sites would need to be monitored on a continual basis to ensure the protective measure is effective. If it is suspected that written or verbal instruction is being ignored, or that markers or barriers placed around the site are insufficient, other strategies will be explored and implemented to ensure protection. *Periodic monitor partnering and tours of certain sites would include interested tribes. Such monitoring would be scheduled in advance, and may occur on an annual basis.*

SOP 7.2 Historic Buildings and Structures

For projects that may affect historic buildings and structures, USAG-AK will consider the following alternatives:

- **Avoidance**: This project alternative provides for avoidance of adverse impacts altogether. This is accomplished by not proceeding with the project or that part of the project that will have the impact, or by relocating a project or features of a project to avoid impacts to cultural resources.

- **Minimize Impact:** Minimize the unavoidable adverse impact by limiting the degree or magnitude of the action and its implementation. This alternative seeks to limit construction impacts to temporarily protect a resource until permanent treatments can be applied, and/or to control the impacts through monitoring and oversight.

- **Preserve, Rehabilitate or Restore the Affected Environment**: This alternative allows for project redesign when involving historic properties, so that the Secretary of the Interior's *Standards for the Treatment of Historic Properties* are applied.

- **Monitoring During the Project:** Any preservation, maintenance or other measures implemented to minimize the effects of an undertaking on a historic building or structure will require ongoing monitoring to ensure the measures are effective. If it is observed that measures originally outlined are insufficient or not effective, or other unforeseen impacts occur, additional preservation alternatives will need to be explored.

- **Adaptive Reuse:** Historic buildings and structures that are no longer needed or suitable for their original use will, to the extent feasible, will be considered for an alternative use that would support other installation missions.

- **Ongoing Preservation and Maintenance:** Reduce or eliminate the cumulative impact of an undertaking through preservation and maintenance operations during the life of the action. Examples include securing historic buildings and structures from exposure to weather and protection of sites from disturbance and erosion.

- **Mothballing:** This alternative provides for sealing a historic building or structure from the elements to temporarily protect it from the weather and secure it from vandalism. These following procedures for properly mothballing a building or structure are based on the NPS *Preservation Brief 31: Mothballing Historic Buildings*:
    - document the architectural and historical significance of the building or structure; and
    - prepare a condition assessment of the building or structure; and
    - structurally stabilize the building or structure, based on a professional condition assessment; and
    - exterminate or control pests, including termites and rodents; and
    - protect the exterior from moisture penetration; and
    - secure the building or structure and its component features to reduce vandalism or break-ins; and
    - provide adequate ventilation to the interior; and
    - secure or modify utilities and mechanical systems; and
    - develop and implement a maintenance and monitoring plan for protection.

STANDARD OPERATING PROCEDURE 8: TREATMENT OF ADVERSE EFFECTS

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

Treatment of adverse effects will be handled through the development of standardized treatments for most mitigation. These standardized treatments should satisfy USAG-AK's needs for most mitigation projects, except perhaps for those very complex projects or extremely significant historic properties, such as the Ladd Field National Historic Landmark, where specialized measures may be needed. The following considerations are presented for the mitigation of archaeological sites, properties of traditional religious and cultural significance, historic buildings, structures, and historic districts.

SOP 8.1   Mitigations Measures for Archaeological Sites

Mitigation for archaeological sites has traditionally focused around data recovery or excavation of the site, in order to record and preserve the information and material contained in the site prior to the occurrence of impacts. However, excavation and data recovery is not the only mitigation alternative for archaeological sites. Avoidance of the site, encapsulation of the site with a layer of protective soil or other matrix, and public interpretation *or combination of measures* may also be explored as mitigation measures.

Mitigation in the form of data recovery is implemented as a last resort when an archaeological site, or a portion of a site, cannot be avoided or physically protected from undertakings. Data recovery consists of excavation and documentation, *analysis, and reporting*. Requirements for documentation are set forth in NPS's *Recovery of Scientific, Prehistoric, Historic, and Archaeological Data: Methods, Standards, and*

Reporting Requirements (1977) and the *Secretary of the Interior's Standards and Guidelines: Archaeology and Historic Preservation* (48 FR 44716, 1983).

A professional archaeologist who has required academic qualifications and preferably has regional experience must conduct excavation. The Archaeological Resources Protection Act (ARPA) details three additional criteria for excavation:

- data recovery must seek to further archaeological knowledge in the public interest;

- resources which are excavated will remain the property of the United States, and such resources and copies of associated documentation will receive curation at an adequate facility; and

- activity associated with excavation must be consistent with other management plans (for instance, natural resources) applicable to the area concerned.

Artifacts recovered during excavation must be curated in accordance with standards established by the Secretary of the Interior *and per SOP 15. Products produced as a result of mitigation will be made available to the signatories of this HPC and the general public through USAG-AK's web page (www.usarak.army.mil) and on request*.

SOP 8.2   Mitigation Measures for Properties of Traditional Religious and Cultural Significance

If the property is one of traditional religious and cultural significance and is eligible for the NRHP, USAG-AK will consult with the appropriate parties to identify suitable mitigation measures. In the event the property is also identified as a sacred site, USAG-AK will fully comply with the requirements of the American Indian Religious Freedom Act of 1978 (AIRFA) and Executive Order 13007: Sacred Sites (EO13007). Any activities related to such sites will be in accordance with AIRFA and EO 13007.

SOP 8.3   Mitigation Measures for Historic Buildings and Structures

Under Section 106 of the NHPA, Federal agencies may be required to mitigate adverse effects to historic properties that are listed in or eligible for listing in the NRHP. When the historic properties are buildings, structures, or objects, and the undertaking consists of demolition or substantial alteration, mitigation may take the form of Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) as general guidance.   Other mitigation measures may include, salvage, educational materials, interpretation, relocation, etc.

SOP 8.3.1 Architectural Documentation

Documentation of historic buildings, structures, or objects, as set forth by the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation: Historic American Building Surveys/Historic American Engineering Record (HABS/HAER) Standards, is comprised of several products, including measured drawings, large format photographs and written data. Each of the products must conform to four standards regarding their content, quality, materials, and preservation. Within each standard, there are varying levels of documentation, each applicable to the nature and significance of the historic property as well as to the reason for documentation. HABS documentation may be conducted on four levels:

- ***Level I Documentation***: Level I is the most in-depth and labor intensive. It includes a full set of field-measured drawings along with maps, black and white photos of interior and exterior, written historical and descriptive accounts, evaluation of significance, and a list of sources.

- ***Level II Documentation***: Level II differs from Level I in using original drawings not measured in the field. Accompanying materials are the same as those required for Level I.

- ***Level III Documentation***: Level III documentation involves a sketch site plan and black and white photos of the interior and exterior. It includes a description of history and evaluation of significance.

- ***Level IV Documentation:*** Level IV documentation is the least intensive and includes a sketch site plan and black and white photographs. A short narrative description and evaluation are also given.

HABS Level IV or III documentation is generally used for inventories, while HABS Level I and II documentation is often reserved for mitigation. Typically, mitigation projects for nationally significant buildings, structure, or objects require Level 1 documentation, i.e., the Ladd Field National Historic Landmark. Because of the precise and professional nature of HABS/HAER documentation, a qualified professional must carry out all such documentation. The individual(s) must meet the Secretary of the Interior's *Professional Qualification Standards* (1983) and the *Proposed Historic Preservation Professional Qualifications* (1997) for Architectural Historic, Architecture, or Historic Architecture. The *CRM will determine* the level of documentation commensurate with the significance of the historic property in question. The documentation will follow the guidance of the HABS/HAER standards.

Architectural documentation of historic properties subject to demolition will include:

- Ladd Field NHL – *Architectural recordation of buildings that contribute to the Ladd Field National Historic Landmark will be documented to HABS Level I Standards when mitigation is required.*

- Buildings/Structures determined eligible for listing in the NRHP (such as the Ladd Air Force Base Historic District) – architectural recordation will consists of "as-built" drawings (Mylar copies), 35mm black and white photographs of general setting of building, exterior elevations of the building and all architectural elements that defines the building's architecture; and development of *an architectural recordation form following HABS Level II Standards as general guidance.*

- *USAG-AK will retain prepared documents and maintain a permanent record of what has been performed. Mitigation records will be made available upon request*.

SOP 8.3.2   Development of Educational Materials and Interpretation

When used for mitigation, educational materials, interpretation, and public outreach efforts should meet the following minimum guidelines.

- *Be accessible to multiple audiences*
- *Demonstrate relevance to soldiers and dependents as the first-line installation caretakers*
- *Be developed in partnership with community and tribal organizations*
- *Have mechanisms for feedback, and an identifiable and consistent POC*
- *Products should be reasonably durable and not ephemeral*

All educational materials and public outreach efforts are to be coordinated with the appropriate installation Public Affairs Office.

SOP 8.4   Mitigation Measures for Historic Districts

SOP 8.4.1   Mitigation Measures for Historic Districts

There are two possible circumstances that could require mitigation measures for a historic district rather than mitigation of specific contributing buildings (described under SOP 8.3). These could occur when impacts from undertakings would substantially alter the integrity of the historic district as an entity eligible for listing in the NRHP. The first circumstance might occur when an undertaking adversely impacts a portion of a historic district, causing the boundary of the district to change. The second type might occur when the undertaking adversely impacts the entire district, causing it to lose its NRHP eligibility. Undertakings which have low to moderate potential impacts to eligible historic districts would be handled under the EA process and specific mitigation developed during public comment. Undertakings that could have significant potential impacts to eligible historic districts may require development of an EIS, with mitigation developed during public comment.

SOP 8.4.2   Mitigation Measures for National Historic Landmarks

Undertakings that could potentially impact the eligibility of the National Historic Landmark as an entity trigger Environmental Impact Statements under NEPA. The CRM in coordination with the National Park Service make determinations of the impact to the eligibility of NHLs. The EIS process would include public input as well as direct comment by the Advisory Council for Historic Preservation. Mitigation measures would be developed through the EIS process.

STANDARD OPERATING PROCEDURE 9: DOCUMENTING ACCEPTABLE LOSS

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

The applicability of this SOP to USAG-AK's decision-making process is conditioned by fulfillment of SOP's 1-8. Unless these previous SOPs have been met, documenting acceptable loss cannot be undertaken. Use of this SOP by USAG-AK should not be frequent, as other mechanisms for compliance with Section 106 under the AAP process will reduce the need to make acceptable loss determinations.

The Garrison Commander will make acceptable loss determinations, after consulting with the CRM. These determinations will be based on weighing the need to mitigate a historic property, which will be adversely affected by an installation undertaking, against public interest decisions and financial considerations. The following examples may be applicable under this SOP:

Properties of Traditional Religious and Cultural Significance: mitigation measures for properties of this type, which are significant to an Alaskan native tribe, must take into consideration the wishes of the tribe. There may be cases where a tribe, understanding the need for a particular installation undertaking and the adverse effects that will result, may decide that mitigation measures should not be undertaken out of respect for their values. In these cases, garrison commanders, may make a decision to forego undertaking standard mitigation measures for this property.

Historic Buildings: avoidance of impacts altogether, renovation and reuse, and leasing or transfer are among the preferable mitigation measures for historic buildings. If these measures cannot be done and it becomes necessary to demolish a historic building, mitigation usually involves recordation through some

level of HABS/HAER documentation. For Army properties that have been constructed under standardized plans, it may not be in the public interest to expend Federal funds to further document a property type that has been adequately documented in the past. In these cases, garrison commanders may make a determination that no mitigation measures be undertaken to treat adverse effects to a historic building scheduled to be demolished.

Archeological Sites: Archeological data recovery is expensive to undertake and should only be done when there is adequate justification to do so. Justification to conduct archeological data recover is typically found in a research design or data recovery plan related to a particular archeological site. Data recovery at archeological sites should focus on gaining new information that will be useful to archeologists to further their understanding of past cultures. It is the responsibility of archeologists to adequately document the need for data recovery. Without adequate justification of the need to conduct archeological data recovery, garrison commanders may make a determination that it is not in the public interest to expend Federal funds for these efforts.

After reviewing all project information and the decisions made in carrying out SOPs 1-8, the CRM will make a recommendation to the Garrison Commander on the need to proceed with documenting acceptable loss. If the Garrison Commander agrees with the recommendations of the CRM, the CRM will assemble a documentation package to be forwarded to those consulting parties who, through previous consultation, have expressed an interest in the type of property under consideration, and to the Advisory Council. This documentation package will include:

- *A letter from the Garrison Commander stating his intention to document acceptable loss,*

- *A discussion of how USAG-AK applied the procedures in SOPs 1-8, and the outcome of each of these steps, and*

- *A rationale as to why treatment of adverse effects should not be considered.*

The Garrison Commander will allow 30 days for consulting parties and the Advisory Council to submit comments on the documentation.   At the close of the review period, the Garrison Commander, in consultation with the CRM will consider these comments in making a final determination on the project. Prior to implementing the undertaking, the Garrison Commander will notify the consulting parties and the Advisory Council, in writing, concerning the outcome of the review and the final decision that was made.

STANDARD OPERATING PROCEDURE 10: REVIEWING AND MONITORING

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

SOP 10.1 NEPA Review Process

The development of SOPs under the Army Alternate Procedures does not remove USAG-AK undertakings involving cultural resources from public review and comment. It coordinates this responsibility with the public comment process in existence for NEPA, the National Environmental Policy Act. Under NEPA, federal undertakings are evaluated based on their level of affect on the quality of the human environment. This wide review considers many aspects of the environment, including cultural resources. The focus of NEPA review is on the decision-making process and the consideration of alternatives and their predicted effects on the environment.

The NEPA process can result in three types of review. First, NEPA provides for Categorical Exclusions (CATEXs) for undertakings that do not normally have a significant environmental impact. Proposals are initially screened against a published list of the agency's CATEXs. SOP 2 provides further guidance for identifying the cultural resources *Exempt Undertakings*. If a proposal is determined to be a CATEX the review is concluded and no public involvement is required. In the Army, these determinations are documented with a Record of Environmental Consideration (REC). If the action or undertaking is not a CATEX, it is reviewed through an Environmental Assessment (EA) or Environmental Impact Statement (EIS). Both of these processes include public review and comment on proposed project alternatives.[2]

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[2] An EIS is triggered when a major Federal action significantly affects the quality of the human environment. An EA is generally used to evaluate projects when the agency is not certain if impacts are significant enough to trigger an EIS. An EA may result in a finding that an EIS is required, or it may result in a finding of no significant impact.

NEPA reviews are conducted by USAG-AK's Environmental Planning Branch in coordination with Army staff and contractors from various disciplines. An EA generally has a 30-day public comment period, advertised in appropriate newspapers. An EIS requires notices in the Federal Register, scoping with formal public hearings, and minimum comment periods on both its draft and final versions (45 days for the draft and 30 days for the final.)

Further information about NEPA in general can be accessed from: http://ceq.eh.doe.gov/nepa/nepanet.htm

SOP 10.1.1   Notification for NEPA Reviews

SOP 10.1.1.1 Actions for which an Environmental Assessment or Environmental Impact Statement is Prepared

The installation shall maintain a list of parties with a demonstrated interest in management of historic properties on the installation. This list shall include, among others, the Alaska SHPO, Alaska Native village governments, Alaska Native village and regional corporations, and other non-governmental organizations participating in development and implementation of this plan.

When it proposes an undertaking with the potential to adversely affect an historic property, the installation, if preparing an Environmental Assessment (EA) or Environmental Impact Statement (EIS), shall use the NEPA process to notify consulting parties and provide an opportunity for their participation in the process. In particular:
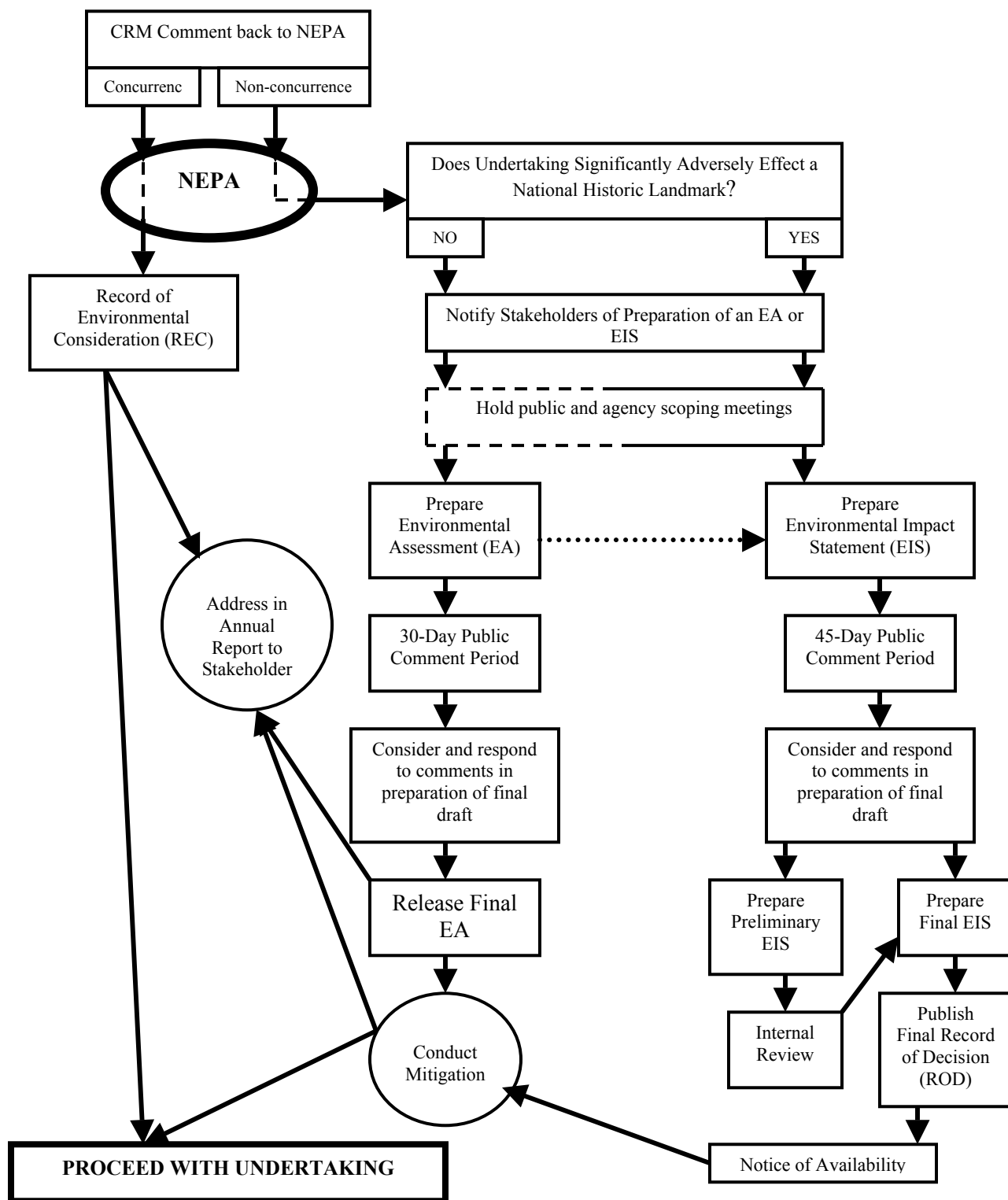
CRM Comment back to NEPA

Concurrenc | Non-concurrence

NEPA

Does Undertaking Significantly Adversely Effect a National Historic Landmark?

NO | YES

Record of Environmental Consideration (REC)

Notify Stakeholders of Preparation of an EA or EIS

Hold public and agency scoping meetings

Address in Annual Report to Stakeholder

Prepare Environmental Assessment (EA)

Prepare Environmental Impact Statement (EIS)

30-Day Public Comment Period

45-Day Public Comment Period

Consider and respond to comments in preparation of final draft

Consider and respond to comments in preparation of final draft

Release Final EA

Prepare Preliminary EIS

Prepare Final EIS

Conduct Mitigation

Internal Review

Publish Final Record of Decision (ROD)

PROCEED WITH UNDERTAKING

Notice of Availability

Figure 7. NEPA Flow Chart

If the installation initiates a public scoping process prior to preparing the EA or EIS, it will specifically notify all consulting parties on the list referenced above and request their participation.

The Draft EA or Draft EIS shall contain information regarding the installation's efforts and methods for identification and evaluation of historic properties, assessment of effects to such properties, and proposed mitigation. The installation shall notify interested parties of the availability of the Draft EA or Draft EIS on USAG-AK's web page and request their review and comment. The notification shall direct the recipient to those portions of the document relevant to historic properties.

The installation shall review and consider all comments submitted by interested parties before finalizing an EA or EIS, and will specifically respond to comments in a Final EIS.

SOP 10.1.1.2 Actions for which an Environmental Assessment or Environmental Impact Statement is not Prepared

If the installation proposes an undertaking that is likely to adversely affect an historic property without preparation of an EA or EIS, the installation shall prepare a Record of Environmental Consideration (REC) focused on effects to historic properties. The REC shall briefly describe the installation's efforts and methods for identification and evaluation of historic properties, assessment of effects to such properties, and proposed mitigation. The REC shall include a statement as to whether all appropriate SOPs in the HPC were adhered to and implemented.

The installation shall maintain all RECs prepared under this SOP and provide them to consulting parties upon request prior to the Annual Review and Monitoring meeting.

SOP 10.1.4 Actions Normally Requiring an Environmental Assessment

The following actions normally require preparation of an EA:

(a) *Special field training exercise or test activity on Army land of a nature or magnitude not within the annual installation training cycle.*

(b) *Military construction, including contracts for off-post construction.*

(c) *An installation pesticide, fungicide, herbicide, insecticide, and rodenticide-use program.*

(d) *Changes to established installation land use that generates impacts on the environment.*

(e) *Proposed changes in doctrine or policy that may have a potential environmental impact.*

(f) *Repair or alteration projects affecting historically significant structures, archaeological sites, or places on, or meeting, the criteria for nomination to the National Register of Historic Places.*

(g) *Acquisition or alteration of, or space for, a laboratory that will use hazardous chemicals, drugs, or biological or radioactive materials.*

(h) *Actions that could potentially cause soil erosion, affect prime or unique farmland, wetlands, floodplains, coastal zones, wilderness areas, aquifers or other water supplies, or wild and scenic rivers.*

(i) *New weapon systems development and acquisition, including the materiel acquisition, transition, and release processes.*

(j) *Development of installation master plan.*

(k) *Development of natural resource management plans (land, forest, fish, and wildlife).*

(l) *Proposals that may lead to the excessing of Army real property.*

(m) *Actions that take place in, or adversely affect, wildlife refuges.*

(n) *Proposals for energy conversion through forest harvest.*

(o) *Field activities on land not controlled by the military. This includes firing of weapons, missiles, or lasers over navigable waters of the United States, or extending 45 meters or more above ground level into the national airspace. It also includes joint air attack training that may require participating aircraft to exceed 250 knots at altitudes below 3000 feet above ground level.*

(p) *An action with local or regional effects on energy availability.*

(q)   An activity that affects any species on, or proposed for, the U.S. Fish and Wildlife Service list of Threatened and Endangered Plant and Animal Species. Also, activities affecting any species on an applicable State or territorial list of threatened or endangered species.

(r)   Production of hazardous or toxic materials.

(s)   Installation restoration projects undertaken in response to the CERCLA. (See § 651.8(a)(8) for a full discussion of the integration of NEPA and CERCLA/SARA.)

(t)   Operations and Maintenance/Army National Guard projects that will impact environmental quality.

(u)   Site specific deployment of lifecycle systems meeting the threshold criteria for requiring an EA.

(v)   Special field training exercises or test activities off Army or DOD property that extend into the national airspace (45 meters above ground level).

(w)   Changes to established airspace use that generates impacts on the environment or socioeconomic systems, or creates a hazard to non-participants.

SOP 10.1.5 Actions Normally Requiring an Environmental Impact Statement

The following actions normally require preparation of an EIS:

(a)   Significant expansion of a military facility or installation.

(b)   Construction of facilities that have a significant effect on wetlands, coastal zones, or other areas of critical environmental concern.

(c)   *The disposal of nuclear materials, munitions, explosives, industrial and military chemicals, and other hazardous or toxic substances that have the potential to cause significant environmental impact.*

(d)   Land acquisition, leasing, or other actions that may lead to significant changes in land use.

(e)   Realignment or stationing of a brigade or larger table of organization equipment (TOE) unit during peacetime (except where the only significant impacts are socioeconomic, with no significant biophysical environmental impact).

(f)   Training exercises conducted outside the boundaries of an existing military reservation where significant environmental damage might occur.

(g)   Major changes in the mission or facilities either affecting environmentally sensitive resources (see Sec. 651.29(c)) or causing significant environmental impact (see Sec. 651.39).

The USAG-AK Conservation website posts current EA's at: http://www.usarak.army.mil/ conservation/env_assessments.htm

SOP 10.2   Annual Review and Monitoring

In addition to project-based NEPA reviews, USAG-AK will also host an annual review and monitoring meeting, hosted by the Director of Public Works. There are three primary purposes of the annual review and monitoring process: to review past undertakings, to discuss upcoming undertakings, and to review the SOPs. USAG-AK will document the annual review meeting and this documentation will be distributed to consulting parties after the conclusion of the meeting. No later than thirty days prior to annual review meeting, USAG-AK will provide signatories to this plan with an annual report addressing how it has met the requirements *and goals* of this plan over the past year. *Consulting parties who want to see or visit particular historic properties that were dealt with under the HPC during the review period must contact USAG-AK four (4) weeks in advance of the annual review meeting so that appropriate arrangements can be made.*

SOP 10.2.1   Review Past Undertakings

USAG-AK and its consulting parties will review selected undertakings that were accomplished during the previous year and get a sense of how these undertakings were handled in accordance with the SOPs in this HPC. In order to achieve this goal, USAG-AK will provide project data on undertakings to the consulting parties throughout the year through the existing NEPA process outlined above in SOP 10.2

SOP 10.2.2   Review Programmed Undertakings

US*A*G-AK will identify those programmed undertakings that are scheduled, or are likely to be scheduled for the next fiscal year *and that may be anticipated beyond one year*. Consulting parties will have an

opportunity during the meeting, or through other forms of communication, to express their views over appropriate methods of identification, evaluation, and treatment of cultural resources likely to be affected by these undertakings. These programmed undertakings will form the basis for review during the next meeting held with consulting parties.

SOP 10.2.3   Review the SOPs in the Historic Properties Component

USAG-AK and its consulting parties will review any of the SOPs that may need to have changes made to them in order to accomplish the historic preservation goals set out in the HPC. SOPs that do not consistently achieve the desired goals will be considered for amendment.

SOP 10.3   Review and Monitoring Schedule

A review and monitoring meeting will take place with all consulting parties on an annual basis, with the first meeting scheduled for one year from the date of certification of this HPC. Since it is unlikely that all consulting parties will have the same interest in the varying resources of the installation, USAG-AK may meet at different times with those consulting parties interested in archeological sites and properties of traditional religious and cultural significance versus those interested in historic buildings, structures, objects, or districts.

STANDARD OPERATING PROCEDURE 11: OBTAINING TECHNICAL ASSISTANCE

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

Consulting parties (including the SHPO and the Tribes), Federal agencies (including the Council and AEC), and some private and public organizations have valuable expertise in the management of cultural resources that USAK-AG can benefit from during implementation of its HPC. The purpose of this SOP is to set the foundation for arrangements that USAG-AK can make to obtain technical assistance from qualified *organizations (consulting parties including SHPO and the Tribes, federal agencies, and other organizations). Also, as a part of this SOP and SOP 16 Capacity Building for Tribes, USAG-AK can provide technical assistance to Tribes in understanding USAG-AK produced documents regarding cultural resources.*

SOP 11.1 Partnerships

USAG-AK recognizes the contributions that stakeholders can make to the management of cultural resources. To that end, USAG-AK has a goal to develop partnerships for the completion of collaborative research and work. Emphasis on developing formal partnerships will be placed on signatories of this HPC and that have expertise in areas that complement USAG-AK's cultural resources staff. Examples of types of services that may be desirable through partnering are, but not limited to:

- *Alaska Native Tribes with information on properties of traditional, religious and cultural significance.*

- *Entities that have the ability to prepare HABS documentation.*

- *Entities that have the ability to perform archaeological excavations to meet mitigation requirements.*

SOP 11.2   Cooperative Agreements

Cooperative Agreements established by the AEC provide USAG-AK and other Army organizations a means to obtain professional cultural resources support from organizations such as universities, *Alaska Native Tribes*, non-profit, and for profit organizations. The Cooperative Agreements involve stakeholders in promoting effective, long term, sound stewardship of the Army's cultural resources. The stakeholder organizations offer flexibility and expertise to promote excellence in all cultural resources program areas.

SOP 11.3   Service Contracts for Technical Assistance

USAG-AK has an ongoing need for technical expertise related to the identification, evaluation, and treatment of cultural resources, and obtains service contracts between the installation and qualified organizations to meet those needs.

Cultural resources contracting is the responsibility of the CRM. The CRM will write scopes of work for all contracted cultural resources activities. Scopes of work will stipulate that prospective contractors meet professional standards as outlined in the *Secretary of the Interior's Professional Qualifications Standards* (48 FR 44738-9). *Tribes are excluded from these requirements due to their recognized special expertise and knowledge.* Deliverables will follow the *Secretary of the Interior's Standards* for the specific cultural resources activity(ies) specified in the contract. The CRM will review cultural resources contracts before they are let to ensure that all specifications spelled out in the scope of work are clearly enumerated in the contract. Once the contract is signed, the CRM will provide technical assistance to the Contracting Officer's Representative.

STANDARD OPERATING PROCEDURE 12: INADVERTENT DISCOVERIES AND EMERGENCY ACTIONS

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

Accidental discovery of archaeological material is always a possibility during ground disturbing activities. Pedestrian surveys cannot always identify all archaeological resources in a survey area. The following are steps to be followed to ensure that archaeological resources are protected in case of an accidental discovery, *rediscovered lost sites, newly communicated sites, and later identified site*s.

SOP 12.1   Responsibility

The Garrison Commander and CRM are responsible for ensuring that accidental discoveries of archaeological material are managed properly. The Garrison Commander will direct the CRM to coordinate with personnel and appropriate parties to ensure that accidental discoveries are addressed in accordance with this Standard Operating Procedure (SOP). Personnel affected by this SOP include those involved in undertakings that could potentially result in accidental discoveries. The CRM must ensure that these personnel are informed on procedures to follow during such an occurrence.

SOP 12.2   Procedures

1. Upon discovery of archaeological materials, all ground-disturbing operations in the vicinity of the find should cease until adequate protection and decisions on mitigation can be implemented. On-site personnel will immediately report the finding to the CRM, who will initiate coordination for protection and treatment. The CRM may be contacted at:

Directorate of Public Works
ATTN: APVR-RPW-EV (Russell Sackett)
730 Quartermaster Road
Fort Richardson, AK 99505-6500
(907) 384-3041
email: russell.sackett@richardson.army.mil

2. The CRM will inspect the area where the material or site was encountered to assess whether the site reflects cultural or natural formations. If the site is determined to be naturally occurring, then no further investigation is necessary, and operations will continue as planned.

3. If the site is determined to be cultural, the area will be treated as potentially eligible for the NRHP and protected as a significant cultural resource until a formal determination of eligibility can be made. The consulting archaeologist will file an AHRS form and may be able to make an immediate determination of eligibility if the site is clearly ineligible for the NRHP. However, consultation with appropriate Alaska Native Tribal Governments should occur in the event of any discovery, to determine if artifacts encountered are funerary objects, or objects of cultural patrimony, pursuant to the Native American Graves Protection Act (NAGPRA).

Notification and consultation with appropriate Native Alaskan Tribal Governments should occur in the event of any discovery, to determine if artifacts encountered are funerary objects, or objects of cultural patrimony, pursuant to the Native American Graves Protection Act (NAGPRA). Decisions should be made with tribes whenever possible, including planning, designing, assessing, and evaluating. Tribes should also be included in work process as a team member investigating the inadvertent discovery. If artifacts encountered are funerary objects, or objects of cultural patrimony, pursuant to the Native American Graves Protection Act (NAGPRA) then the case would proceed outside the scope of the HPC and would dealt with in the ICRMP.

If the site is determined to be cultural and operations cannot be re-designed to avoid the site completely, USAG-AK will follow SOP 8. Meanwhile, ground-disturbing activities will remain suspended. Construction may resume at the site when appropriate mitigation has been completed.

4. If the site contains human burials, funerary items, or other objects of cultural patrimony, USAG-AK will consult with *Alaska Native* Tribes per NAGPRA prior to resumption of ground disturbance, regardless of NRHP eligibility[3]. A NAGPRA Plan of Action will be developed *as part of the Integrated Cultural Resources Management Plan* in order to address the treatment and repatriation of Native American human burials, funerary items and objects of cultural patrimony encountered during ground-disturbing activities on USAG-AK managed lands.

If an inadvertent discovery occurs during an emergency action, measures in SOP 12.3 will be followed. Otherwise it is unnecessary to treat every inadvertent discovery as if it was under direct threat of destruction. It is in the best interest of the cultural resource to be thorough during inventory and evaluation of the site. During evaluation tribes will be consulted. Full excavation of the site will be done only as a last resort.

SOP 12.3   Emergency Actions

There may be times that USAG-AK must respond to disasters or emergencies that affect the operations and missions of the installations. These emergencies can be both natural or in response to situations that result from human events. This may also include those actions necessary to respond to a threat to national security, including short-term mission essential activities for deployable troops.

Activities and actions undertaken to respond to disasters and emergencies can have an adverse effect on cultural resources located on the installations. There may be instances where known cultural resources

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[3] Eligibility for listing in the National Register of Historic Places is not a criterion pursuant to NAGPRA.

will be affected or where unidentified cultural resources will be affected by activities taking place in areas

of the installation that have not been previously inventoried.

As with inadvertent discoveries, emergency actions require an expedited process for handling cultural

resources that may be affected by emergency action.

- within 48 hours of the formal disaster or emergency declaration by the Installation Commander, the CRM will determine the necessary course of action to minimize damage to potential and known cultural resources and the potential for salvage of any cultural resource data;
- If data recovery and/or recordation is necessary, it will include, but not be limited to, any of the following:
  - where subsurface disturbance over an area that has not been inventoried has occurred, either as a result of the disaster or the cleanup effort, archaeological inventory of all exposed surfaces will occur; and/or

  - if known archaeological site(s) or properties of traditional religious and cultural significance are damaged, but the damage is minor, protective strategies designed to prevent further site degradation will take place; and/or

  - in the event that the damage to an archaeological site(s) or property of traditional religious and cultural significance is severe, and the site was or may have been eligible for the NRHP, a report will be prepared documenting the damage and the potential for salvage of values that cannot otherwise be conserved. If the potential for salvage is high, a research design will be prepared and salvage will proceed when normalcy is restored. If there is little or no potential for salvage, the damage will be documented in photographs, artifacts at the site will be collected and documented, and no further site investigation will take place; and/or

  - if demolition or disposal of a NRHP listed or eligible building, structure, or object is necessary due to life safety issues as the result of a disaster or emergency, recordation will be limited to photographs of all exterior surfaces and features. Only those interior features that may be safely accessed may be documented with photographs; and/or

  - if a NRHP eligible or listed building, structure, or object is damaged, initial repair will be limited to stabilization and protection from further damage. Rehabilitation will be undertaken at a later date in accordance with this HPC when normalcy is restored, and subject to availability of funds; and/or

  - if known properties of traditional religious and cultural significance are damaged, consultation on treatment will be coordinated. *Tribes will have the opportunity to submit a resolution with preferences. The resolution would be used when emergency conditions do not allow for consultation to occur. Verbal contact could be an option. An emergency contact list will be compiled. A contact list for each presently known site will be compiled.*

- appropriate consulting *parties* will be notified of USAG-AK's actions;

- documentation of emergencies will occur for the subject project.

- *Emergency actions and documentation will be addressed in annual report.*

STANDARD OPERATING PROCEDURE 13: NATIONAL HISTORIC LANDMARKS

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

USAG-AK currently has one historic property that is a National Historic Landmark: the Ladd Field NHL on Fort Wainwright. NHPA Section 110(f) requires the Installation Commander to undertake planning and actions to minimize harm to National Historic Landmarks and provide reasonable opportunity for the Advisory Council on Historic Preservation to comment on undertakings that directly and adversely affect National Historic Landmarks. Use and appropriate maintenance of the buildings, structures, and cultural landscape of the Landmark, as required by NHPA Section 110(a)(1), will ensure proper management of the NHL. Maintenance of contributing resources of the NHL must be carried out in accordance with "The Secretary of the Interior's Guidelines for Treatment of Historic Properties" and "The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes." The "Installation Design Guide," completed in 1991, also addresses issues that must be considered when planning maintenance activities for the NHL. Upgrading heating, electric, and plumbing, and abating lead based paint and asbestos where necessary will be required to allow continued use of buildings and structures. USAG-AK's management goals include completing a building assessment for one contributing resource of the Ladd Field NHL annually and coordinating planning and actions to minimize harm to the Ladd Field NHL.

SOP 13.1   Responsibility

The Garrison Commander is responsible to undertake planning and actions to minimize harm to National Historic Landmarks. The Garrison Commander will direct the CRM to coordinate with personnel and appropriate parties to ensure that activities in a NHL addressed in accordance with this Standard Operating Procedure (SOP). Personnel affected by this SOP include those involved in undertakings that

could potentially result in impacting the NHL. The CRM must ensure that these personnel are informed on procedures to follow during such activities.

SOP 13.2   Procedures

13.2.1 Determining Undertaking

The CRM will determine if a project, activity, or program is an undertaking as defined by SOP 1.

- *If the CRM, following SOP 1, determines that the project, activity, or program is not an undertaking, no further action is necessary.*

- *If the CRM, following SOP 1, determines that the project, activity, or program is an undertaking, then the CRM will proceed to Section 13.2.2.*

13.2.2 Categorical Exclusions

The CRM will determine if proposed undertaking is a categorically excluded undertaking as outlined in SOP 2.

- *If the proposed undertaking is a categorical exclusion, the CRM will document decision and proceed with project. A summary of categorical exclusion documentation will be provided in the Annual Report.*

- *If proposed undertaking is not a categorical exclusion, the CRM will proceed to Section 13.2.3.*

13.2.3 Environmental Assessments

If undertaking proposed is for replacement of a contributing building to the NHL, a building condition and cost estimate to address bringing the building up to contemporary use and codes shall be conducted by an outside party that meets the Secretary of the Interior's qualifications to do so. Information will be made part of the EA in addressing the alternative of maintaining the building for continued use.

An EA will be prepared if a proposed undertaking is determined not to be a categorical exclusion by the CRM. In the preparation of the EA, the CRM will follow procedures in SOP 3, SOP 4, and SOP 5 to determine impacts of proposed projects to the NHL.

- *If the EA results in the Finding of No Significant Impacts (FONSI), the CRM will document decision and provide copy of EA and FONSI to the National Park Service Alaska Support Office (NPS-AKSO) and other signatory parties to this HPC and proceed with the undertaking.*

- *If the EA results in a finding of Significant Impact, then the CRM will proceed to Section 13.2.4*

13.2.4 Environmental Impact Statement

An EIS will be prepared if an EA determines that a project will result in a significant impact to the NHL. The CRM will document the decision and initiate the Scoping process. The CRM will invite the NPS-AKSO and other signatories of this HPC to participate in the Scoping process.

- *The EIS's Record of Decision (ROD) will document the measures that USAG-AK will be required to perform to mitigate adverse effects undertaking may have on the NHL.*

- *The CRM will provide a copy of the completed EIS and ROD to NPS-AKSO and other signatories to this HPC.*

The NPS-AKSO contact person for these procedures is:

National Historic Landmark Historian
NPS-AKSO
240 W. 5th Avenue, Room 114
Anchorage, AK 99501-
Phone: 907.644.3470
FAX: 907.644.3811

STANDARD OPERATING PROCEDURE 14: SHARED PUBLIC DATA

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

SOP 14.1   Sensitive Archaeological Site Information

The confidentiality of the nature and location of archaeological resources is provided for in 32 CFR § 229.18. The confidentiality and location of historic properties is provided for in 36 CFR § 800.11, pursuant to Section 304 of the National Historic Preservation Act. USAG-AK and the Alaska State Historic Preservation Officer signed an agreement in April 1998 in which the State of Alaska agreed to share cultural resources site location information for Forts Wainwright and Richardson with USAG-AK. This information is maintained on a Geographic Information System (GIS) database at Fort Richardson. Access to this information is restricted. The Garrison Commander is responsible for ensuring the confidentiality of cultural resources location information. The Garrison Commander will direct the CRM to coordinate with the Staff Judge Advocate (SJA) and appropriate GIS Technicians to maintain the confidentiality of cultural resources location information.

Ownership of information provided by Tribes belongs to the Tribes. Confidentiality of information is important, and includes responsible, accountable use of information provided by the Tribes to USAG-AK.

USAG-AK's cultural resource documents will be prepared so that maps of specific site locations are easily removable. Documents for the public will be copied so that maps or site forms (i.e., Alaska Heritage Resource Survey forms) are not included.

SOP 14.2   Interaction with Federally Recognized Tribal Governments, Public and Interested Parties

Historic preservation laws and regulations require Federal agencies to provide federally recognized Tribes, the public and interested parties with the opportunity to comment on cultural resources management activities that may affect them. The process used to accomplish consultation on these issues regarding USAG-AK managed lands is the National Environmental Policy Act (NEPA) process outlined in 40 CFR § 1506.6 "Public Involvement" (see also Section 1.2.3: NEPA). AR 200-2 also provides procedures for involving the public.

14.2.1   Who is responsible for public involvement?

The USAG-AK Installation Commander is responsible for ensuring proper public and federally recognized tribal government involvement in cultural resources management activities. The Garrison Commander will direct the CRM to coordinate with appropriate personnel to facilitate public and tribal government involvement.

14.2.2 Who are the participants in public involvement?

Participants in public involvement include:

- Installations;
- Public Affairs Officer (PAO);
- *Alaska Native Organizations (e.g., Alaska Native Corporations);*
- *general* public;
- interested parties.

14.2.2   Who are the participants in Tribal involvement?

In accordance with Executive Order 13175, the Garrison Commander must directly contact Federally Recognized Indian Tribes (including Alaska Native Tribal Governments) when their participation is needed.

Non-federally recognized tribes and other _Alaska Native_ organizations may express interest in certain activities and will be included in the process under public involvement as they are identified. _Alaska Native Organizations will not be engaged in Tribal involvement, unless a federally recognized Tribe requests their presence (i.e., for technical assistance, etc.)._

14.2.3   Procedures for Non-Cultural Resources Management USAG-AK Personnel

The Public Affairs Officer (PAO) will review requests for public comment on cultural resources matters. The PAO will send media releases to appropriate news and clearinghouse organizations. It does not participate in gathering public comments at forums.

SOP 14.3 Publication of Archaeological and Other Cultural Resource Investigations

Publication is an important aspect of archaeology and other cultural resource investigation. USAG-AK analyses are published for the general public and can be acquired by contacting the USAG-AK CRM at (907) 384-3041 or by downloading from USAG-AK's webpage.

STANDARD OPERATING PROCEDURE 15: CURATION OF ARTIFACTS

> **Note: The SOPs presented here are intended only to initiate discussion on the HPC. The procedures for identifying undertakings and defining APEs in the final HPC will be the result of consultation on development of the HPC with consulting parties.**

Artifacts recovered through cultural resources management activities must be curated in compliance with 36 CFR § 79, *Curation of Federally-Owned and Administered Archaeological Collections*. This regulation and 48 FR 44737, *Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines* establish standards that curation facilities must meet in order to house artifacts removed from public lands. The curation of artifacts removed from the cantonment areas of USAG-AK's installations is the responsibility of the Cultural Resources Manager, acting on behalf of the Garrison Commander.

The University of Alaska (Fairbanks) Museum serves as the primary repository for cultural and natural history collections from university research and academic units, state and federal agencies, and Alaska Native Corporations. As such it will curate artifacts recovered from USAG-AK installations.

Through a Cooperative Agreement with the University of Alaska (Fairbanks) Museum, USAG-AK has procedures in place for curation of artifacts recovered from USAG-AK managed lands. It is the responsibility of BLM, as an Archaeological Resources Protection Act (ARPA) permitting agency, to ensure that those holding permits issued by it properly prepare and deposit collected artifacts at the University of Alaska (Fairbanks) Museum.

ARPA permit holders conducting surveys on USAG-AK installations must prepare artifacts for curation in accordance with the requirements identified in the permit. The University of Alaska (Fairbanks)

Museum has specific requirements for preparation of artifacts that must be met prior to acceptance for curation. This will be clearly spelled out in any permits that may require the curation of recovered artifacts.

The Cultural Resources Manager will ensure that all artifacts recovered on USAG-AK managed lands are properly curated. Scopes of work and contracts drawn up for historic and archaeological surveys will include a copy of the guidelines for curation of artifacts, as required by the University of Alaska (Fairbanks) Museum. The Cultural Resources Manager will include the costs of curation as part of the overall project costs.

> Archaeology Collections Manager
> University of Alaska (Fairbanks) Museum
> P.O. Box 756960
> Fairbanks, AK 99775
> (907) 474-6943

STANDARD OPERATING PROCEDURE 16: CAPACITY BUILDING FOR TRIBES

> **Note:**
> **The following SOP headings were suggested during the initial Scoping Meetings held in March 2003. They are presented here as topics for additional discussion during upcoming scoping meetings.**

USAG-AK cultural resources program may place significant demands on the regulatory, administrative, and management structure of Alaskan Native Tribes. USAG-AK can increase Tribal capacity for dealing with cultural resource management issues by providing technical assistance, equipment and facilities, triaging, and access to culturally significant sites. USAG-AK may also provide technical assistance to aid Tribes with understanding USAG-AK documents when requested. Possible examples of capacity building programs to explore may include, but are not limited to, the following

- *Section 106 training*

- *NEPA training*

- *GIS and GPS training/program development*

- *National Register of Historic Places training*

- *Properties of Traditional, Sacred and Cultural Significance training*

- *USAG-AK Cultural Resources mentoring programs.*

The implementation of capacity building programs is dependent upon the availability of funds.

Development of mutually beneficial agreements between USAG-AK and federally recognized Tribes in Alaska can also build tribal capacity significantly. Such agreements would be accomplished through work sessions between USAG-AK and those Tribes that wish to do so. This will help ensure the inclusion

of procedures and outcomes desired by any one Tribe and should not exclude ideas and desires of other

Tribes.

STANDARD OPERATING PROCEDURE 17: PROCESS FOR TRIBAL PARTICIPATION AND CONSULTATION

> **Note:**
> **The following SOP headings were suggested during the initial Scoping Meetings held in March 2003. They are presented here as topics for additional discussion during upcoming scoping meetings.**

Consultation is communication that emphasizes trust and respect. It is a shared responsibility that allows an open and free exchange of information and opinion among parties that leads to mutual understanding and comprehension. Consultation is integral to a process of mutually satisfying deliberations to result in collaboration and joint decision making.

Participation is effective, mutually satisfactory, joint decision-making. In true participation, an individual is not required to endorse or accept unilateral decisions made by either party.

Consultation with, and participation of relevant Tribes should occur as early and often as needed or desired by all parties. It should be facilitated and remain meaningful throughout the relevant projects and processes from there initiation until a mutually satisfactory conclusion is reached.

Tribal initiation of consultation and meaningful participation may occur at any time throughout the projects/process. USAG-AK offers of Tribal consultation and participation should be triggered by relevant and significant events, such as discoveries of cultural phenomena, or initiation of projects/processes potentially affecting cultural phenomena. USAG-AK CRM shall coordinate with the USAG-AK Native Liaison to initiate Tribal consultation on relevant cultural issues. USAG-AK CRM should remain informed of Tribal concerns, through frequent interaction with relevant Tribes, academic,

agency, and other sources, and utilize this information to decide when tribal consultation/participation is needed.

USAG-AK and each Tribe, according to their internal procedures and protocols, will designate Government-to-Government representatives for consultation purposes. Various DoD and Tribal representatives and participants will be appropriate to fulfill various roles. For example, staff can accomplish much work and interaction in service of projects development. Signatories to agreements between the parties will be high-level representative officials from each organization.

Section 106 plan development with Tribes cannot be compensated, but Tribal consultation for Section 110 planning projects might be compensated.

STANDARD OPERATING PROCEDURE 18: *HONORING AND PARTICIPATING IN TRADITIONAL AND CULTURAL PRACTICES*

> **Note:**
> **The following SOP headings were suggested during the initial Scoping Meetings held in March 2003. They are presented here as topics for additional discussion during upcoming scoping meetings.**

Because Tribes are obligated to carry out their traditions and culture, the Army is permitted to honor and participate in such practices. This will serve as a tool to facilitate tribal obligations rather than deterring culture through prohibitions.

18.1   Sharing food at business gatherings

Food is an important part of tribal meetings. The time and effort made in preparing and offering meals to USAG-AK staff should always be acknowledged. It is equally important for USAG-AK to provide refreshments at USAG-AK hosted meetings and events (although this can be difficult since federal funds cannot be used to purchase food).

18.2   Invitations to events

To be developed in conjunction with Tribes.

18.3   Invitations to speak

To be developed in conjunction with Tribes.

18.4   Gift guidance between USAG-AK and Tribes

Gifting occurs as an outward act to express: thank you, appreciation, to honor someone, to conclude something, to begin something, as a greeting, to present to guests such as speakers, to recognize genuine

connection, to apologize, to comfort, to recognize a kindness or a favor, to show status or prominence, to mark important events, and for other important or significant occasions and people.

Gifting times range from very formal, to independent and personal occasions. Here are examples. Invited speakers are often given gifts to show appreciation and to honor the importance of their presence. When not made clear, gifts given to a chief or President are to the tribe, and not considered personal property unless clearly given to the person. When someone performs a kindness that is not an obligation, such as allowing someone to stay in his or her home, a gift is a way to say thank you at a later time. When someone comes to a village, they might bring something the people would appreciate, perhaps fruit during winter. It is the thought that went into it and the act that shows the value of appreciation. Bringing a gift to an elder's house honors them and shows a sense of cherishment. It is known that when someone gives something they made, such as a blanket to keep an elder warm, that fact that many hours, days, or even weeks went into the making of the item. Gifts are not a requirement. They are selected thoughtfully, to meet a need, to be meaningful to the receiver, to be cherished. They can be to benefit the whole community as well.

When traveling to villages or hosting meetings, it is appropriate for the Garrison Commander or highest ranking Army official authorized to do so per regulation may elect to provide "official courtesies" to "authorized guests," such as gifts or food, to honor the hospitality offered to Army staff by the village. This would be pursuant to AR 37-47 and DoD 7250.13, and coordinated by USAG-AK CRM and USAG-AK Native Liaison through the USAG-AK Protocol office. This honors the time and expense that tribal delegates have taken to attend the meeting and demonstrates courtesy and respect. Food, particularly, is an important part of tribal meetings at villages, and time and effort made in preparing and offering meals to USAG-AK staff should always be acknowledged.

18.5   Traditional Trade

To be developed in conjunction with Tribes.

18.6   Subsistence

Traditionally used subsistence resources include plant harvesting, hunting and fishing. Subsistence resources includes wildlife potentially within and migrating through Army lands.

When planning meetings for consultation, USAG-AK should keep in mind the yearly schedule of subsistence activities that may cause tribal representatives to be unavailable at certain times of the year (for example, the late summer/early fall months are a crucial period for subsistence activities). Also try to take into consideration the demanding effort it may take to travel from villages to installation headquarters. Whenever possible, requests for consultation should be mailed at least a month in advance of the proposed meeting date.

If invited by tribal members to participate in subsistence activities, or to try traditional foods, USAG-AK staff are highly encouraged to partake.

18.7   Language

English is a second language for many Alaska Natives, especially among Alaska Native elders. Although they may speak and understand English, they may feel more comfortable if meetings are translated into their Native language. When necessary, USAG-AK should have translator services provided at tribal meetings.

It is also important and respectful to be aware of basic words and their meanings (i.e., thank you, etc.), especially when holding meetings in Native villages.

18.8   Interpretation of Terms

To be developed in conjunction with Tribes.

18.9   Other Practices

To be developed in conjunction with Tribes.